GIBSON DUNN

Gibson, Dunn & Crutcher LLP

200 Park Avenue New York, NY 10166-0193 Tel 212.351.4000 www.gibsondunn.com

Christopher M. Joralemon Direct: +1 212.351.2668 Fax: +1 212.351.5268 CJoralemon@gibsondunn.com

October 23, 2023

VIA ECF

The Honorable Eric Komitee United States District Court for the Eastern District of New York 225 Cadman Plaza East, Courtroom: 6G North Brooklyn, New York 11201

Re: In re: Vale S.A. Securities Litigation, No. 19 Civ. 526 (EK) (SJB)

Dear Judge Komitee:

I write respectfully on behalf of Defendants in the above-referenced matter to inform the Court of Defendants' intention to file a Motion for Class Decertification based on newly adduced expert evidence. Pursuant to Section III.C.2 of the Court's Individual Rules and Practices, the parties have negotiated a briefing schedule, and will file a complete set of all motion papers on November 17, 2023.

Respectfully submitted,

/s/ Christopher M. Joralemon

cc: All Counsel of Record (via ECF)